

September 30, 2011

MEMORANDUM TO: John R. Jolicoeur, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager **/RA/**  
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 5, 2011, U.S. NUCLEAR REGULATORY  
COMMISSION MEETING WITH THE TECHNICAL SPECIFICATIONS  
TASK FORCE

On August 5, 2011, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Technical Specifications (TS) Task Force (TSTF) to discuss technical issues and administrative processes related to TSTF Travelers. The meeting was held at NRC offices in One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. A list of the meeting attendees is enclosed. The meeting notice and agenda, dated July 15, 2011, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML111940325.

The NRC staff and TSTF representatives discussed the topics as presented on the agenda. These topics included: issues related to completing Revision 4 of Improved Standard TS; the status of the Travelers currently under NRC review; issues related to previously approved Travelers; and other technical issues facing the industry that are generically related to TSs.

Members of the public who participated via teleconference are listed with the meeting attendees. No public meeting feedback forms were received.

For selected agenda items, the NRC staff or TSTF representatives gave presentations or provided handouts to facilitate discussion and/or serve as an information exchange. The presentation slides and handouts are listed below and are publicly available in ADAMS.

- DAEC [Duane Arnold Energy Center] Proposal to Consolidate Identical SRs [Surveillance Requirements] after SFCP [Surveillance Frequency Control Program] Adoption (ADAMS Accession No. ML11224A117).
- Active Travelers Status Report (ADAMS Accession No. ML11224A118).
- TSTF Concerns with the Proposed NFPA [National Fire Protection Association]-805 License Conditions (ADAMS Accession No. ML11224A119).
- Compliance and Safety Concerns with Required Actions 3.8.1.B.3.1 and B.3.2 (ADAMS Accession No. ML11224A120).

I. Administrative

- A. Introductions
- B. Agenda Review
- C. Other Administrative Issues – Mr. Robert Elliott, NRC, discussed the upcoming Office of Nuclear Reactor Regulation (NRR) reorganization. Specifically, the Technical Specifications Branch (ITSB) is moving on October 9 from the Division of Inspection and Regional Support to the Division of Safety Systems.

II. Discussion of Development of Improved Standard TS Revision 4

- A. Mr. Gerry Waig, NRC, stated that the boiling water reactor (BWR) NUREGs (NUREG-1433 and -1434) have been delayed due to the Fukushima response. Mr. Elliott, NRC, indicated that because of the delay in reviewing the BWR NUREGs, the NRC may publish the pressurized water reactor (PWR) NUREGs (NUREG-1430, -1431, and -1432) first followed by the BWR NUREGs about a month later. Mr. Tony Browning, TSTF, stated that the 1-month delay in the BWR NUREGs was acceptable, because there are no BWR plants in the queue for TS conversion right now. The NRC staff noted that there is an approximate 1-month publication process once the NUREGs are sent to the Government Printing Office. Therefore, it is likely to get all the NUREG revisions issued by end of the calendar year.
- B. Mr. Waig, NRC, discussed a Bases issue in NUREG-1434 (BWR/6), Specification 3.8.1, Condition E.1, that they would like to incorporate into Revision 4.
  - 1. NUREG-1434, Specification 3.8.1, Condition E.1, Bases currently states:

With two DGs [diesel generators] inoperable, there is one remaining standby AC [alternating current] source. ... In the event Division 3 DG in conjunction with Division 1 or 2 DG is inoperable, with Division 1 or 2 remaining, a significant spectrum of breaks would be capable of being responded to with onsite power. Even the worst case event would be mitigated to some extent - an extent greater than a typical two division design in which this condition represents complete loss of onsite power function. Given the remaining function, a 24 hour Completion Time is appropriate. At the end of this 24 hour period, Division 3 systems could be declared inoperable (see Applicability Note) and this Condition could be exited with only one required DG remaining inoperable. However, with a Division 1 or 2 DG remaining inoperable and the HPCS [high pressure core spray] declared inoperable, a redundant required feature failure exists, according to Required Action B.2. (Emphasis added).
  - 2. The NRC disagrees that it is appropriate to declare the operable HPCS inoperable for the sole purpose of extending the Completion Time. The NRC requested the TSTF propose a "T" Traveler to remove or modify the last two sentences in order to clearly prohibit HPCS inoperability for the sole purpose of extending DG Completion Time.
  - 3. Action - the TSTF will submit a "T" Traveler to revise the Bases.

III. Process Issues

- A. TSTF July 5, 2011, letter requesting NRC revise Part 9900 Technical Guidance, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety"

1. Mr. Timothy Kobetz, NRC, stated that the NRC is moving Part 9900 documents to other document types as they are revised, to provide permanent durable guidance since Part 9900 has become a "dumping ground" for documents.
  2. Mr. Elliott, NRC, said that NRC will be considering the requested change in September.
  3. Mr. Brian Mann, TSTF, warned the NRC staff to be very careful in documenting to use correct term (safety function vs. specified safety function). Part 9900 document uses terms opposite of how they are used in TS. The revision is a knowledge management and consistency issue. Part 9900 needs to be revised and fixed before related parties retire and move on. The revision won't cause any problem with licensees – because they have been using the correct definitions. The TSTF does not consider this a high priority item.
- B. Recent licensing action issues related to TSTF-425
1. At the last TSTF/NRC meeting, the TSTF expressed concerns that the NRC technical staff had not been trained on TSTF-425, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b," and the resulting impact on the licensees and the TSTF. The TSTF discussed two additional examples that underscore the need for the NRC technical branches to be trained on The Nuclear Energy Institute (NEI) document NEI 04-10 and TSTF-425.
    - a) Byron has TSTF-425 approved and implemented into its TS. They submitted an amendment which added a new SR. The NRC technical staff would not approve the license amendment request (LAR) unless a 12-hour periodic Frequency was included in the new SR. Byron needed the LAR and agreed.
    - b) Mr. Matthew Hamm, NRC, stated that they had reviewed the LAR and commented that the 12-hour periodic Frequency should be replaced with a reference to the SFCP. He will follow-up internally to determine why the comment was not incorporated.
    - c) Mr. Browning, TSTF, gave a presentation "DAEC proposal to consolidate identical SRs after SFCP" (ADAMS Accession No. ML11224A117). Duane Arnold proposed to consolidate the post-TSTF-425 identical instrument Surveillances rather than having multiple Channel Calibration, Channel Check, and Channel Functional Test SRs. At the time of the submittal the NRC stated that would be contrary to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36.
      - (1) After discussion, the NRC agreed the consolidation would be acceptable if the LAR explained how there was no technical change to the requirements.
      - (2) Mr. Elliott, NRC, recommended the licensees provide more of an explanation in the LAR and not refer to the consolidation as an administrative change. He also recommended including selected example clean pages in the LAR.
      - (3) The TSTF will consider a Footnote or Reviewer's Note to the appropriate specifications stating that it is acceptable to consolidate the duplicate SRs.
  2. Mr. Elliott, NRC, stated that technical staff training on TSTF-425 is being pursued.
- C. Split of fees for non-exempt reviews
1. For future non-fee exempt Travelers that affect both the Pressurized Water Reactor Owners' Group (PWROG) and the BWR Owners' Group (BWROG), the TSTF will request that the NRC bill both the PWROG and BWROG and the NRC will divide the review hours evenly. This will replace the current practice of

alternating the billing for common Travelers, which has not resulted in equitable sharing of the review fees.

IV. Active Traveler Review Status (Handout in ADAMS at Accession No. ML11224A118)

- A. TSTF-426, Revision 4, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF [Risk-informed TSTF] Initiatives 6b & 6c"
  - a) The TSTF will submit a revision with the requested editorial changes on August 8, 2011.
- B. TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)"
  - a) Actions delayed due to Fukushima response. The Notice for Comment date is moved from September 30, 2011, to November 30, 2011.
- C. TSTF-490, Revision 1, "Deletion of E Bar Definition and Revision to RCS [reactor coolant system] Specific Activity Tech Spec"
  - 1. NRC has request for additional information (RAI) questions which are under review with the technical staff branch chief.
  - 2. The TSTF stated that if the RAI questions undermine the approved portions of TSTF-490, the revision may be withdrawn.
  - 3. The NRC staff anticipates issuing the RAI questions by September 14, 2011.
- D. TSTF-500, Revision 2, "DC Electrical Rewrite - Update to TSTF-360"
  - 1. The Notice of Availability was sent to Division of Operator Reactor Licensing (DORL) in NRR for a two-week review to identify any "fatal flaws," that would affect licensees using the model application. ITSB emphasized it is not a technical review.
    - a) The NRC plans to do this for all future Travelers but earlier in the review process.
  - 2. If no issues are identified by DORL staff, the August 31, 2011, target date for the Notice of Availability may be met.
- E. TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"
  - 1. Review delayed due to Fukushima response.
  - 2. The Notice for Comment scheduled date is changed from August 31, 2011, to October 31, 2011.
- F. TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection"
  - 1. Received TSTF comments and comments from one member of the public.
  - 2. NRC expects to meet the scheduled date of October 20, 2011, for the Notice of Availability.
- G. TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"
  - 1. The NRC is on schedule to publish the Notice for Comment by October 31, 2011.
- H. TSTF-523, Revision 0, "Generic Letter 2008-01, Managing Gas Accumulation"
  - 1. The NRC provided a letter to the TSTF on May 25, 2011, requesting substantial changes to TSTF-523.
  - 2. The NRC and TSTF met to discuss further on August 4, 2011. The TSTF proposed an alternative approach and agreed to draft a proposal for consideration at a future public meeting, tentatively scheduled for the week of November 10, 2011.

- I. TSTF Traveler review priority
  - 1. Mr. Brian Mann, TSTF, reviewed traveler priorities. Mr. Elliott, NRC, commented that the NRC staff agrees with the TSTF priority, with one exception: the NRC views TSTF-523 as high priority.
  - 2. High Priority
    - a) TSTF-500, DC Electrical Rewrite - Update to TSTF-360
    - b) TSTF-505, Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b
    - c) TSTF-432, Change Technical Specifications End States (WCAP-16294)
  - 3. Medium Priority
    - a) TSTF-523, Rev. 0, GL 2008-01, Managing Gas Accumulation
    - b) TSTF-426, Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c
    - c) TSTF-522, Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month
  - 4. Low Priority
    - a) TSTF-490, Deletion of E Bar Definition and Revision to RCS [reactor coolant system] Specific Activity Tech Spec
    - b) TSTF-510, Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection
- J. The TSTF is preparing to submit TSTF-535, Revise Shutdown Margin Definition to Address Advanced Fuel Designs, which is applicable to BWRs. It addresses new fuel types in BWRs that require a change to the Shutdown Margin definition.

V. Issues with Previously Approved Travelers

- A. TSTF-501, Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control
  - 1. The Palisades LAR, which adopted TSTF-501 and applies to a licensing basis of sufficient fuel oil for 7-day operation of one emergency DG (EDG), not all EDGs, has been approved.
  - 2. The TSTF will send a letter to the NRC proposing an additional model application and suggested changes to the model SE and request the NRC to revise the Notice of Availability, based on the Palisades LAR.
- B. Status of NRC Withdrawal of TSTF-363, -408, and -419.
  - 1. The letter was signed on August 4, 2011, and will be available in ADAMS on August 12, 2011.

VI. Technical Issues

- A. Compliance and safety concerns with Required Actions 3.8.1.B.3.1 and B.3.2
  - 1. Mr. Jack Stringfellow, TSTF, gave a presentation on the industry concerns with Specification 3.8.1, "AC Sources - Operating," Required Actions B.3.1 and B.3.2 which require performance of a common cause evaluation or starting the other diesel when one DG is inoperable (ADAMS Accession No. ML11224A120).
  - 2. The NRC staff agreed that there is a structural problem with the TS related to identifying a new or different failure mechanism after the 24 hour Completion Time for the Required Action common cause evaluation has expired. Mr. Matthew McConnell, NRC, commented that the TSTF members had some valid points in their first option and agreed to consider a change, but commented that the elimination of the common cause from the TS (the second option in the TSTF presentation) would not be acceptable.
  - 3. This traveler development is medium priority and no time line has been set.

4. Mr. Stringfellow, TSTF, brought up the GL 9[3]-05 exceptions. It was determined that if the GL 9[3]-05 exceptions for performing common cause evaluations are incorporated, there needs to be a more precise definition of the terms and especially of "independently testable component." (It was identified after the meeting that the TSTF slides referenced the incorrect generic letter number. The correct reference should have been GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation.")
  5. The TSTF will create a Traveler to address the issue, taking the NRC comments into consideration.
- B. TSTF concern with scope of NFPA-805 license conditions
1. While preparing the LAR on NFPA-805 the DAEC identified some questions/concerns with the license conditions. Mr. Browning, TSTF, gave a presentation (ADAMS Accession No. ML11224A119).
  2. The NRC Fire Protection Branch (AFPB) staff did not understand the TSTF's standing on the issue. The TSTF stated that the license is within their purview and noted that there have been Travelers on the license conditions.
  3. Ms. Michelle Honcharik, NRC, recommended the TSTF engage the NEI Task Force and the NRC AFPB staff to address the issues. She also suggested that DAEC should consider a pre-submittal meeting.
- C. Status of NRC actions related to SR 3.0.3 application to the IST Program & recommendation for an Enforcement Guidance Memorandum
1. The NRC management team agreed to the issuance of an Enforcement Guidance Memorandum (EGM) and a Regulatory Issue Summary (RIS) relative to the IST program and SR 3.0.2 and SR 3.0.3. It was agreed that further discussion is needed.
  2. The NRC staff also wants to address the general issue of SR 3.0.2 and SR 3.0.3 references in the Administrative Controls as the wording is inconsistent (e.g., there are no LCOs in the Administrative Controls but SR 3.0.3 references LCOs).
  3. The TSTF agreed we should address the issue in a holistic fashion.
- D. Status of TSTF-493 Implementation Guidance
1. Mr. Elliott, NRC, stated that the lead technical reviewer will be working on a white paper on this 3<sup>rd</sup> week of August.
  2. Once the NRC issues the white paper, the TSTF plans to prepare an implementation guide with the Electric Power Research Institute (EPRI) and the owners' groups for plants to use. The TSTF will share the implementation guide with the NRC.
- E. Summary of July 27, 2011, BWROG/NRC meeting on operations with the potential to drain the reactor vessel (OPDRVs).
1. TSTF members commented that the OPDRV meeting was very productive.
  2. The BWROG and NRC staff discussed a Traveler to comprehensively address questions on OPDRV implementation. However, it will likely take at least 2 years to develop, review, and approve the change.
  3. The NRC staff is willing to entertain one-time TS changes for BWRs with fall 2011 and spring 2012 outages to modify the requirement for secondary containment to be Operable during OPDRVs if licensees will broadly apply the OPDRV requirements.
  4. The NRC has consulted with the Containment, Reactor Safety, Accident Dose, Operating Experience, and Project Management branches and all are in agreement.

5. Mr. Browning, TSTF, will provide the NRC with a list of BWRs with fall and spring outages and NRC will develop a set of criteria for the change.
6. Mr. Elliott, NRC, commented that plants with fall 2011 and spring 2012 outages may need enforcement discretion. The NRC staff is considering an EGM for 1 year, and then the NRC would expect licensees to submit 1-time amendments until the TSTF traveler (whole new LCO for OPDRVs) can be approved. Mr. Elliott, NRC, suggested that a public telephone call to discuss enforcement guidance criteria may be necessary in late August.

VII. Future Planning

- A. Potential Risk-Informed Section 3.0 traveler on Containment Sumps
  1. Ms. Wendy Croft, TSTF, handed out copies of NEI letter dated July 5, 2011 (ADAMS No. ML11189A080). Ms. Croft specifically pointed to Pages 2 and 3 of Attachment 3. The NEI is awaiting feedback from NRC staff on their comments. NRC suggested they forward a copy of the letter directly to the technical lead.

VIII. Meetings in 2011 and Closing Remarks

- A. Next TSTF / NRC quarterly meeting scheduled for Thursday, November 10, 2011.
- B. TSTF- 523 meeting tentative for week of November 7, 2011.

Please direct any inquiries to me at 301-415-1774 or at [Michelle.Honcharik@nrc.gov](mailto:Michelle.Honcharik@nrc.gov).

Project No. 753

Enclosure:  
List of Attendees

cc w/encl: See next page

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List of Attendees

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**ADAMS Accession Nos:** Package: ML112200024, Meeting summary: ML112200025  
Meeting notice and agenda: Package ML111940325  
Meeting handouts: ML111940325, ML11224A118, ML11224A119, and ML11224A120

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Project No. 753

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**Attendees at the U.S. Nuclear Regulatory Commission (NRC) and  
Technical Specifications Task Force (TSTF) Meeting**

**August 5, 2011**

<b>Name</b>	<b>Organization</b>
Michelle Honcharik	NRC/Office of Nuclear Reactor Regulation (NRR)/Division of Policy and Rulemaking (DPR)/Licensing Processes Branch (PLPB)
John Jolicoeur	NRC/NRR/DPR/PLPB
Robert Elliott	NRC/NRR/Division of Inspection and Regional Support (DIRS)/Technical Specifications Branch (ITSB)
Timothy Kobetz	NRC/NRR/DIRS/Reactor Inspection Branch (IRIB)
Khadijah Hemphill	NRC/NRR/DIRS/ITSB
Gerald Waig	NRC/NRR/DIRS/ITSB
Matthew Hamm	NRC/NRR/DIRS/ITSB
Shaun Anderson	NRC/NRR/DIRS/ITSB
Ravi Grover	NRC/NRR/DIRS/ITSB
Matthew McConnell	NRC/NRR/Division of Engineering (DE)/Electrical Engineering Branch
Craig Harbuck	NRC/Office of New Reactors (NRO)
*Nancy Chapman	Sciencetech
Wendy Croft	TSTF
Tony Browning	TSTF
Brian Mann	TSTF
Jack Stringfellow	TSTF
William Steelman	TSTF

\*Participated via teleconference.

ENCLOSURE